

# **Statement of Basis**

**Tier I Operating Permit No. T1-2017.0047**

**Project ID 61932**

**Woodgrain Millwork Inc. – Fruitland**

**Fruitland, Idaho**

**Facility ID 075-00001**

**Final**

**April 11, 2018**

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**Permit Writer**

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

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APPENDIX A - EMISSIONS INVENTORY

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## 1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	continuous emission monitoring systems
CFR	Code of Federal Regulations
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	CO <sub>2</sub> equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
HAP	hazardous air pollutants
hp	horsepower
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMscf	million standard cubic feet
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
RICE	reciprocating internal combustion engines
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per consecutive 12 calendar month period
T1	Tier I operating permit
T2	Tier II operating permit
TAP	toxic air pollutants
ULSD	ultra low sulfur diesel
VOC	volatile organic compound
WMI	Woodgrain Millwork Incorporated

## **2. INTRODUCTION AND APPLICABILITY**

Woodgrain Millwork Incorporated (WMI), Fruitland facility which mills and finishes wood door components, mouldings, and window parts., and is located at 300 NW16th, Fruitland, Idaho. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit volatile organic compounds (VOC) above the major source threshold of 100 tons-per-year. The facility is not major facility for hazardous air pollutants (HAP), as defined by Subsection 008.10.a. In accordance with the Permit to Construct No. P-2016.0031, issued on October 6, 2016, the HAP emissions from the entire facility are limited to below the major source thresholds of 10 tons-per-year for any single HAP and/or 25 tons-per-year for any combination of HAP.

As a major facility, WMI is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit must contain a certification from WMI as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09).

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for WMI.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

The WMI's Tier I operating permit is organized into sections. They are as follows:

### **Section 1 – Acronyms, Units, and Chemical Nomenclature**

This section lists the acronyms, units, and the chemical nomenclature.

### **Section 2 - Tier I Operating Permit Scope Facility-Wide Conditions**

The scope describes this permitting action.

### **Section 3 – Facility-Wide Conditions**

The Facility-wide conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

### **Sections 4 through 6 – Wood Processing and Handling, Coating and Gluing; and Printing**

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

### **Section 7 – Emergency Generator Engine**

This section lists the applicable requirements of 40 CFR 63 Subpart ZZZZ that apply to the diesel emergency diesel generator engine exits at the facility.

### **Section 8 - Insignificant Activities**

This section lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

## Section 9 - General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

### 3. FACILITY INFORMATION

#### Facility Description

Woodgrain Millwork processes dried rough-cut lumber into decorative mouldings and window and door parts for the housing, manufactured housing and recreational vehicle markets. Additionally WMI treats window parts to meet Window and Door Manufacturing Association (WDMA) standards and “prefinishes” mouldings and doors with coatings, and wraps simulated finishes on mouldings.

The facility site consists of eight manufacturing buildings and various storage and administrative buildings.

Building 1 contains the moulding wrapping operation, a raw moulding warehouse, and a spray booth for prefinishing doors.

Building 2 contains the coating and print operations. Mouldings can be coated with paint and/or printed with a simulated wood pattern

Building 3 contains various moulding and shaping equipment and a water borne prime operation.

Building 4 contains aripsaw and optimization cut line, various moulders and shapers, RF ovens, and the woodtreat operation.

Building 5 contains an automated optimization process cut line, various finger jointers, and various moulders and shapers

Building 6 contains the various shapers, moulders and embossing equipment.

Building 9 contains various finger jointers, various moulders shapers.

Building 10 contains the pellet mill operations (Deemed PTC Exempt Project #61726).

Building 11 contains the shavings bagging operation. Most of the shavings produced at the facility are bagged and sold as animal bedding.

#### Facility Permitting History

##### Tier I Operating Permit History - Previous 5-year permit term from January 28, 2013 to January 28, 2018

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from January 28, 2013 to January 28, 2018. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

January 28, 2013	T1-2012.0011 , previous Tier I operating permit renewal. (A, will be S as a result of this project)
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#### Underlying Permit History - Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

February 20, 1998	Permit No. 075-00001, permit to construct (PTC) for dimensional lumber process/wood shavings bagging operation, initial PTC (S).
January 22, 1999	PTC No. 075-00001, a new PTC for millwork coating (prefinish) process (S).
June 19, 2002	PTC No. 075-00001, PTC modification (S).
December 11, 2002	Initial Tier I operating permit No. 075-00001 (S)
July 6, 2007	Tier II operating permit and PTC No. T2-020024, issued as required by the compliance schedule found in Tier I operating permit No. 075-00001, issued on December 11, 2002 (S).
July 6, 2007	Tier I operating permit No. T1-060054, issued concurrently with Tier II operating permit No. T2-020024 to incorporate the applicable requirements of the Tier 2 operating permit into the Tier I operating permit (S).
January 28, 2013	T1-2012.0011, previous Tier I operating permit renewal. (A, will be S as a result of this project)
June 10, 2016	An Exemption Concurrence was granted for additional process equipment consisting of a pellet mill, a moulder, and their associated emission control (5 cyclones and a bag house) (A)
October 6, 2016	Tier II operating permit No. T2-020024 converted to a standard PTC P-2016.0031 (A)

## **4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY**

### **Application Scope**

This permit is the renewal of the facility's currently effective Tier I operating permit.

### **Application Chronology**

August 14, 2017	DEQ received an application from WMI to renew the facility's effective Tier I operating permit.
October 10, 2017	DEQ determined the application complete.
December 21, 2018	DEQ provided the draft permit and the statement of basis for peer review.
January 5, 2018	DEQ provided the draft permit and the statement of basis to the facility for review.
January 23, 2018	DEQ received comment on the draft permit and the statement of basis from the facility.
March 6, 2018 – April 9, 2018	DEQ provided the draft Tier I operating permit for public comment and affected states review. No public or affected states comments were received.
April 9, 2018	DEQ provided the proposed permit and the statement of basis to EPA Region 10 for review.

April 9, 2018 EPA notified DEQ that they will not be reviewing the proposed permit action and will not object to its issuance. EPA stated, “The permit is now eligible for issuance.”

April 11, 2018 DEQ issued the final renewed Tier I operating permit to the facility.

## 5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

### 5.1 Wood Processing and Handling

The following is a narrative description of the wood processing and handling operations regulated in this Tier I operating permit. This description is for informational purposes only.

This emission unit consists of the wood processing and handling operations for the following manufacturing areas at the Fruitland facility: Prefinish (Coatings, Wrap) and Millwork (Optimization, Decramold, Animal Bedding, Bailing, Woodtreat, and Storage). Wood processing consists of cutting, moulding, shaping, and joining of wood. Wood processing also consists of wood treatment for fungicide, base coat application, painting, lamination, and hammer hog processing of scrap materials. Wood handling also consists of the transfer of sawdust and shavings by pneumatic conveyance and drop transfers for the following process areas: Prefinish and Millwork. Wood processing consists of cutting, joining of wood, moulding, and shaping.

In addition, on June 10<sup>th</sup>, 2016 an Exemption Concurrence (PROJ 61726) was granted for a pellet mill with a cyclone on the pellet cooler and three closed loop cyclones and a baghouse as material handling equipment to handle materials. A moulder with a cyclone for material handling was also added under Exemption Concurrence. This equipment’s associated emissions have been accounted for in the Emissions Inventory for this Statement of Basis. However, this equipment is not listed as regulated sources for permitting purposes.

In the previous Tier 1 permit “Millwork Baghouse N15” and “Millwork Baghouse N15” were not separately identified. Instead they were labeled collectively as “Millwork Baghouse N”. It was determined in processing the renewal application that the emissions from both baghouse N15 and N10 were accounted for in the previous Tier 1 permit as well as the renewal application. Subsequently, the current individual labeling of N15 and N10 baghouses does not represent a change in facility emissions.

Table 5.1 lists the emissions units and control devices associated with Wood Processing and Handling.

**Table 5.1 WOOD PROCESSING AND HANDLING EQUIPMENT DESCRIPTION**

Emissions Units / Processes	Control Devices	Emission Point
Millwork Cyclone B	Uncontrolled	Cyclone B Stack
Millwork Cyclone C	Uncontrolled	Cyclone C Stack
Millwork Cyclone I	Uncontrolled	Cyclone I Stack
Millwork Baghouse G	Uncontrolled	Baghouse G Stack
Millwork Baghouse E	Uncontrolled	Baghouse E Stack
Millwork Cyclone J	Uncontrolled	Cyclone J Stack
Millwork Cyclone K	Uncontrolled	Cyclone K Stack
Millwork Baghouse L	Uncontrolled	Baghouse L Stack

Millwork/Optimizing Baghouse M	Uncontrolled	Baghouse M Stack
Millwork Baghouse N15	Uncontrolled	Baghouse N15 Stack
Millwork Baghouse N10	Uncontrolled	Baghouse N10 Stack
Millwork Cyclone D	Uncontrolled	Cyclone D Stack
Decramold Cyclone H	Uncontrolled	Cyclone H Stack

## 5.2 Coating and Gluing

The following is a narrative description of the coating and gluing operations regulated in this Tier I operating permit.

This process consists of coating and gluing operations for the following manufacturing areas at the Fruitland facility: Prefinish and Millwork - Woodtreat. Coating and gluing consists of roll coating, fan coating, curtain coating, gluing, and wood treatment operations at the facility.

Volatile organic Compounds (VOC) emissions from the coating and gluing are uncontrolled. Hazardous air pollutants (HAP) emissions are controlled by limiting the HAP content of coatings, thinners, and cleaning materials used in the coating and gluing operation.

## 5.3 Printing

The following is a narrative description of the printing operations regulated in this Tier I operating permit.

This emission unit consists of the printing operations at the Fruitland facility. Printing consists of product rotogravure printing of substrate which is applied to products manufactured at facility.

The VOC and HAP emissions from the printing process are uncontrolled.

## 5.4 Emergency Generator Engine

The following is a narrative description of the printing operations regulated in this Tier I operating permit.

MWI maintains one Kohler Power System, Model 230 compression ignition engine onsite for emergency purposes with a rated capacity of 347 brake horse power. The engine was installed in February of 2004.

Emissions from the generator engine are uncontrolled.

## 5.5 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. Table 5.2 lists the IEU's identified in the permit application. Also summarized is the regulatory authority or justification for each IEU.

**Table 5.2 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION**

Emissions Unit/Activity	Regulatory Authority/Justification
Operation of Tanks less than 260 gallon capacity	IDAPA 58.01.01.317.01.b.i.(1)
Operation of Tanks less than 1,100 gallon capacity	IDAPA 58.01.01.317.01.b.i.(2)
Operation of Tanks less than 10,000 gallon capacity	IDAPA 58.01.01.317.01.b.i.(3)
Operation of Propane Tank less than 40,000 gal capacity	IDAPA 58.01.01.317.01.b.i.(4)
Batch solvent distillation, not greater than fifty-five (55) gallons batch capacity.	IDAPA 58.01.01.317.01.b.i.(15)
Space heaters and hot water heaters using natural gas, propane or kerosene and generating less than five million (5,000,000) Btu/hr.	IDAPA 58.01.01.317.01.b.i.(18)
Surface coating, aqueous solution or suspension containing less than one percent (1%) volatile organic compounds.	IDAPA 58.01.01.317.01.b.i.(25)



emission units or activities with potential emissions less than or equal to the significant emission rate as defined in Section 006 and actual emissions less than or equal to ten percent (10%) of the levels contained in Section 006 of the definition of significant and no more than one (1) ton per year of any hazardous air pollutant.	IDAPA 58.01.01.317.01.b.i.(30)
Welding	IDAPA 58.01.01.317.01.b.i.(9)
Storage and handling of water-based lubricants for metal working	IDAPA 58.01.01.317.01.b.i.(27)

## 5.6 Non-applicable Requirements for Which a Permit Shield is Requested

This section of the permit lists the regulations for which the facility has requested, and DEQ proposes to grant, a permit shield pursuant to IDAPA 58.01.01.325. The findings on which this shield is based are presented below:

- Requirements for Which a Permit Shield Will Be Granted

The facility has not requested any permit shields as a result of this permit renewal.

- Requirements for Which a Permit Shield Will Not Be Granted

The facility has not requested any permit shields as a result of this permit renewal.

## 5.7 Emissions Inventory

Table 5.3 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

The Emission Inventory in Table 5.3 is based off the Emission Inventory presented in the Statement of Basis from P-2016.0031 issued October 6, 2016. Since that permitting action, no change in emissions or modification to the facility has taken place.

**Table 5.3 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)**

Source Description	PM <sub>10</sub> T/yr	NO <sub>x</sub> T/yr	SO <sub>2</sub> T/yr	CO T/yr	VOC T/yr	Lead T/yr	HAP T/yr
Baghouses and Cyclones	4.9 (4.11+0.79 <sup>1</sup> )	--	--	--	--	--	--
Coating, Gluing, and Printing	--	--	--	--	813.6	--	< 25
Diesel Generator Engine	0.19	2.69	0.18	0.58	0.22	--	N/A
<b>Total Emissions</b>	<b>5.09</b>	<b>2.69</b>	<b>0.18</b>	<b>0.58</b>	<b>813.82</b>	<b>--</b>	<b>&lt; 25</b>

<sup>1</sup> Emissions from the exemption project # 61726

## 6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable

requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Wood Processing and Handling;
- Coating and Gluing;
- Printing;
- General Provisions;

### ***MRRR***

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping and reporting to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. This is known as gap filling. In addition to the specific MRRR described under each permit condition, generally applicable facility-wide conditions and general provisions may also be required, such as monitoring, recordkeeping, performance testing, reporting, and certification requirements.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, a description of why and how the condition was changed is provided.

### ***State Enforceability***

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

### ***Federal Enforceability***

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the following permit conditions and MRRR have been paraphrased. Refer to the permit for the complete requirements.

## **6.1 Facility-Wide Conditions**

### **Permit Condition 3.2 - Fugitive Dust**

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 4/11/15]

### **MRRR (Permit Conditions 3.3 through 3.5)**

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;

- Conduct facility-wide inspections of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

#### **Permit Condition 3.6 - Odors**

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

#### **MRRR (Permit Condition 3.7)**

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State only), 5/1/94]

#### **Permit Condition 3.8 - Visible Emissions**

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

#### **MRRR (Permit Condition 3.9 through 3.10)**

- Conduct facility-wide inspections of all emissions units subject to the visible emissions standards (or rely on continuous opacity monitoring);
- If visible emissions are observed, take appropriate corrective action and/or perform a Method 9 opacity test;
- Maintain records of the results of each visible emissions inspection.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

#### **Permit Conditions 3.11 through 3.15 - Excess Emissions**

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the excess emissions facility wide conditions and the regulations of IDAPA 58.01.01.130-136.

#### **MRRR (Permit Conditions 3.11 through 3.15)**

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136.

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;
- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory;
- Notify DEQ of each excess emissions events as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ.
- Maintain records of each excess emissions event.

### **Permit Condition 3.16 – Fuel-Burning Equipment PM Standards**

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid.

[IDAPA 58.01.01.676-677, 5/1/94]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 3.17 - Sulfur Content Limits**

The permittee shall not sell, distribute, use, or make available for use any of the following:

- Distillate fuel oil containing more than the following percentages of sulfur:
  - ASTM Grade 1 fuel oil, 0.3% by weight
  - ASTM Grade 2 fuel oil, 0.5% by weight
- DEQ may approve an exemption from these fuel sulfur content requirements (IDAPA 58.01.01.725.01 725.04) if the permittee demonstrates that, through control measures or other means, SO<sub>2</sub> emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725, 4/11/15]

#### **MRRR - (Permit Condition 3.18)**

The permittee shall maintain documentation of supplier verification of fuel sulfur content on an as received basis.

[IDAPA 58.01.01.322.06, 5/1/94]

### **Permit Condition 3.19 - Open Burning**

The permittee shall comply with the “Rules for Control of Open Burning” (IDAPA 58.01.01.600-623).

[IDAPA 58.01.01.600-623, 3/29/12]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 3.20 - Asbestos**

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 3.21 - Accidental Release Prevention**

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 3.22 - Recycling and Emissions Reductions**

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 3.23 - NESHAP 40 CFR 63, Subpart A - General Provisions**

This facility is subject to NESHAP Subparts KK and ZZZZ, and is therefore required to comply with applicable General Provisions, Subpart A.

[40 CFR 63, Subpart A]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 3.24 - Monitoring and Recordkeeping**

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

## **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Conditions 3.25 through 3.28 - Performance Testing**

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 4/5/00]

## **MRRR**

The permittee shall submit compliance test report(s) to DEQ following testing.

### **Permit Condition 3.29 - Reports and Certifications**

This permit condition establishes generally applicable MRRR for submittal of reports, certifications, and notifications to DEQ and/or EPA as specified.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

## **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 3.30 - Incorporation of Federal Requirements by Reference**

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein.

[IDAPA 58.01.01.107, 3/29/17]

## **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

## **6.2 Emissions Unit - Specific Emissions Limits and MRR**

This section of the statement of basis contains the emissions limits, emissions standards, and the monitoring, recordkeeping and reporting requirements (MRRR) for this facility. The regulatory authority to impose the permit conditions is included in the permit and is also listed below each permit condition as a regulatory citation. These permit conditions are the applicable requirements for this facility.

According to the Tier I operating permit renewal application, with the exception of the exemption project #61726, no significant changes have occurred at the facility that would have increased the facility's

emissions during the previous Tier I operating permit term. Thus, for this section of the statement of basis the previous regulatory analysis was relied upon from the existing previous Tier I operating permit that was issued to WMI on January 13, 2013.

There is, however, a slight change in the regulatory analysis in this statement of basis to reflect changes to DEQ's most current Tier I operating permit template, standard facility wide permit conditions and also to reflect amendments to the applicable Subpart ZZZZ requirements since the issuance of the currently existing Tier I operating permit to the facility.

## **Wood Processing and Handling**

**Permit Condition 4.1** – Visible emission, this permit condition limits the visible emissions to 20% opacity, as specified in Permit Condition 3.8, pursuant to IDAPA 58.01.01.625

### **MRRR - (Permit Condition 3.9)**

Compliance with this permit condition is determined through the facility-wide permit condition 3.9.

**Permit Condition 4.2** – General Compliance Requirements, this permit condition requests the permittee to operate all the baghouses and the cyclones listed in Table 4.1 of the permit at all times when the prefinish and millwork processes are operating.

## **Coating and Gluing**

**Permit Condition 5.1** – HAP Emission Limits, this permit condition limits the HAP emission limits from the entire facility to less than 10 tons per any consecutive 12-calendar month period (T/yr) for a single HAP and to less than 25 tons per any consecutive 12-calendar month period for any combination of HAPs.

This permit condition also limits the acetaldehyde and the formaldehyde from the entire facility to less than 0.148 and 0.048 pounds per hour, respectively.

**Permit Condition 5.2** – VOC Emission Limits. The permittee is required to limit the VOC emissions from the entire facility to less than 813.6 tons per year.

### **MRRR - (Permit Conditions 5.3-5.7)**

Compliance with the permit condition is determined by Permit Conditions 5.3 through 5.7.

## **Printing**

**Permit Condition 6.1** – HAP Emission Limits, this permit condition limits the HAP emission limits from the entire facility to less than 10 tons per any consecutive 12-calendar month period (T/yr) for a single HAP and to less than 25 tons per any consecutive 12-calendar month period for any combination of HAPs.

This permit condition also limits the acetaldehyde and the formaldehyde from the entire facility to less than 0.148 and 0.048 pounds per hour, respectively.

**Permit Condition 6.2** – VOC Emission Limits. The permittee is required to limit the VOC emissions from the entire facility to less than 813.6 tons per year.

### **MRRR - (Permit Conditions 6.3-6.8)**

Compliance with the permit condition is determined by Permit Conditions 6.3 through 6.8.

## **General Provisions**

Unless expressly stated, there are no MRRR for the general provisions.

### **General Compliance, Duty to Comply**

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

### **General Compliance, Need to Halt or Reduce Activity Not a Defense**

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

### **General Compliance, Duty to Supplement or Correct Application**

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

### **Reopening, Additional Requirements, Material Mistakes, Etc.**

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

### **Reopening, Permitting Actions**

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If the permittee files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

### **Property Rights**

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

### **Information Requests**

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

### **Information Requests, Confidential Business Information**

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

### **Severability**

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

### **Changes Requiring Permit Revision or Notice**

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 3/25/16; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]



Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

### **Federal and State Enforceability**

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98;  
Idaho Code §39-108; 40 CFR 70.6(b)(1), (2)]

### **Inspection and Entry**

Upon presentation of credentials, the facility shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

### **New Applicable Requirements**

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

### **Fees**

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

### **Certification**

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

### **Renewal**

The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

### **Permit Shield**

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
  - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:
  - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
  - The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
  - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;  
IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;  
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

### **Compliance Schedule and Progress Reports**

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00;  
40 CFR 70.6(c)(3) and (4)]

### **Periodic Compliance Certification**

The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as specified.

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified;
- All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

#### **False Statements**

The permittee may not make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

#### **No Tampering**

The permittee may not render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

#### **Semiannual Monitoring Reports.**

In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months as specified.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

#### **Reporting Deviations and Excess Emissions**

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

#### **Permit Revision Not Required, Emissions Trading**

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

#### **Emergency**

In accordance with IDAPA 58.01.01.332, an “emergency” as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

## 7. REGULATORY REVIEW

### **Attainment Designation (40 CFR 81.313)**

The facility is located in Payette county which is designated as attainment or unclassifiable for PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>2</sub>, SO<sub>2</sub>, and Ozone. Reference 40 CFR 81.313.

### **Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)**

The facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for VOC as demonstrated previously in the Emissions Inventory Section of this analysis. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10, and is subject to Tier I permitting requirements.

### **PSD Classification (40 CFR 52.21)**

The facility is a major facility for the purposes of the federal prevention of significant deterioration (PSD) program as referenced by IDAPA 58.01.01.205 because the facility emits or has the potential to emit a regulated criteria air pollutant in amounts greater than or equal to the major threshold criteria of 250 T/yr.

### **NSPS Applicability (40 CFR 60)**

The facility is not subject to any NSPS requirements 40 CFR Part 60.

### **NESHAP Applicability (40 CFR 61)**

The facility is not subject to any National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements in 40 CFR 61.

### **MACT Applicability (40 CFR 63)**

#### **40 CFR 63 Subpart QQQQ , National Emission Standards for Hazardous Air Pollutants (NESHAPS): Surface Coating of Wood Building Products**

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for wood building products surface coating sources. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations.

#### ***§63.4681 Am I subject to this subpart?***

*(a) Except as provided in paragraphs (c) and (d) of this section, the source category to which this subpart applies is surface coating of wood building products, which means the application of coatings using, for example, roll coaters or curtain coaters in the finishing or laminating of any wood building product that contains more than 50 percent by weight wood or wood fiber excluding the weight of any glass components, and is used in the construction, either interior or exterior, of a residential, commercial, or institutional building. The wood building products source category includes the subcategories listed in paragraphs (a)(1) through (5) of this section.*

*(1) Doors, windows, and miscellaneous. The doors, windows, and miscellaneous subcategory includes doors, windows, finished doorskins, and door and window components such as millwork, moulding, or trim, and other miscellaneous wood building products including, but not limited to, all moulding and trim, shingles, and shutters.*

*(2) Flooring. The flooring subcategory includes solid wood flooring, engineered wood flooring, and wood laminate flooring.*

*(3) Interior wall paneling and tileboard. The interior wall paneling and tileboard subcategory includes interior wall paneling products. Tileboard is a premium interior wall paneling product.*

*(4) Other interior panels. The other interior panel subcategory includes panels that are sold for uses other than interior wall paneling, such as coated particleboard, hardboard, and perforated panels.*

*(5) Exterior siding and primed doorskins. The exterior siding and primed doorskins subcategory includes lap or panel siding, trimboard, and primed doorskins. Doorskins that are coated with more than primer are included in the doors, windows, and miscellaneous subcategory.*

*(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in §63.4682, that uses 4,170 liters (1,100 gallons) per year, or more, of coatings in the source category defined in paragraph (a) of this section and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP). A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.*

*(c) This subpart does not apply to surface coating and other operations that meet the criteria of paragraphs (c)(1) through (5) of this section.*

*(1) Surface coating in the processes identified in paragraphs (c)(1)(i) through (xi) of this section that are part of plywood and composite wood product manufacturing and would be subject to subpart DDDD of this part when promulgated:*

*(i) Edge seals applied to a reconstituted wood product or plywood.*

*(ii) Anti-skid coatings applied to reconstituted wood products.*

*(iii) Primers applied to waferboard or oriented strand board (OSB) siding at the site of manufacture of the waferboard or OSB siding.*

*(iv) Surface coating that occurs during the manufacture of fiberboard, including application of clay slurry, titanium dioxide, or asphalt coatings to fiberboard.*

*(v) Painting of company logo information on plywood or reconstituted wood products.*

*(vi) Application of trademarks and grade stamp to reconstituted wood products or plywood.*

*(vii) Application of nail lines to reconstituted wood products.*

*(viii) Synthetic patches, wood patches, and wood putty applied to plywood.*

*(ix) Application of concrete forming and other drying or tempering oils to wood building products.*

*(x) Veneer composing.*

*(xi) Application of shelving edge fillers to reconstituted wood products.*

*(2) Surface coating of wood furniture subject to subpart JJ of this part, including finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components. The surface coating of millwork and trim associated with cabinet manufacturing is also subject to subpart JJ of this part and not to this subpart.*

*(3) Surface coating that occurs during the manufacture of prefabricated homes and mobile/modular homes.*

*(4) Surface coating that occurs at research or laboratory facilities; janitorial, building, and facility construction or maintenance operations; or hobby shops that are operated for personal rather than for commercial purposes. The source category also does not include non-commercial coating operations or coating applications using handheld nonrefillable aerosol containers.*

*(5) Wood treatment or fire retardant operations located at wood building products sources that involve impregnating the wood product with the wood treatment chemicals or fire retardant by using a retort or other pressure vessel.*

*(d) If you have an affected source with surface coating operations subject to the requirements of another subpart of this part that account for at least 95 percent of the total (annual) coating usage for the affected source, you may demonstrate compliance with the requirements, including all applicable emission limit(s), for that subpart for the entire affected source.*

While WMI was once a major source of HAPs and subject to 40 CFR 63 Subpart QQQQ, the facility established an area source status and obtained from DEQ a Tier II/PTC No. T2-020024, issued on July 6, 2007. However, due to EPA's "Once in Always In" policy established by memorandum in 1995 WMI was required to continue to comply with 40 CFR 63 Subpart QQQQ. On January 25, 2018 by another published memorandum the "Once in Always In" policy was reversed. Under this reversal, sources that demonstrate and maintain area source status are no longer subject to major source MACT requirements. As such 40 CFR 63 Subpart QQQQ does not apply to WMI and its previously associated permit conditions have been removed under this permitting project.

#### **40 CFR 63 Subpart KK, NESHAP for the Printing and Publishing Industry**

This subpart establishes compliance options, operating requirements, and work practice requirements for hazardous air pollutants (HAP) emitted from existing and new facilities at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated manufacturing facilities that are a major source of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the compliance options, operating requirements, and work practice requirements for printing and publishing facilities that are a major source of HAP emissions. The requirements of this subpart which pertain to product and packaging rotogravure, or wide-web flexographic printing presses apply to this facility because the facility performs rotogravure printing on substrate which is applied to products manufactured at facility and facility-wide HAP emissions of the facility had exceeded major source thresholds at one time. While once a major source for HAP emissions, the facility became an area source for HAP emissions after the compliance date of Subpart KK, which is May 30, 1996.

The facility established area source status and obtained from DEQ a Tier II/PTC No. T2-020024, issued on July 6, 2007.

40 CFR 63.820(a)(3) states "Each facility for which the owner or operator chooses to commit to and meets the criteria stated in 40 CFR 63.820(a)(2) shall be considered an area source, and is subject only to the provisions of 40 CFR 63.829(d) and 40 CFR 63.830(b)(1) of Subpart KK." Therefore, the only applicable requirements that apply to the facility with regard to Subpart KK are 40 CFR 63.829(d) and 40 CFR 63.830(b)(1); and these requirements are included in the renewed Tier I operating permit.

**40 CFR 63 Subpart ZZZZ, NESHAP for Stationary Reciprocating Internal Combustion Engines**

40 CFR 63 Subpart ZZZZ..... NESHAPS for Stationary Reciprocating Internal Combustion Engines

The facility has an existing emergency fire pump engine with a capacity of 347 bhp that is subject to National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ. The requirements of this subpart are included in the permit.

§ 63.6585 *Am I subject to this subpart?*

*You are subject to this Subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.*

*(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differs from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.*

*(c) An area source of HAP emissions is a source that is not a major source.*

WMI does operate a 347 bhp emergency fire pump periodically throughout the year and it is used in emergency situations only. In addition, the facility is an area source for HAPs as they are below the major source thresholds of 10 T/yr for any one federally regulated HAP and 25 T/yr for all HAPs combined. This is assured by Permit Condition 7.2 within the permit.

§ 63.6590 *What parts of my plant does this subpart cover?*

*This subpart applies to each affected source.*

*(a) Affected source. An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.*

*(1) Existing stationary RICE.*

*(iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.*

The engine located at WMI is considered existing as it was constructed before June 12, 2006.

§ 63.6595 *When do I have to comply with the subpart?*

*(a)(1) If you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than June 15, 2007. If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. If you have an existing stationary SI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.*

The applicable IC engine must be in compliance with the Subpart no later than May 3, 2013.

§ 63.6600 *What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?*

The applicable IC engine is not operating at a major source for HAP emissions. Therefore there are no applicable emission and operating limitations under this section.

*§ 63.6601 What emission limitations must I meet if I own or operate a 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than 500 brake HP located at a major source of HAP emissions?*

The applicable IC engine is not operating at a major source for HAP emissions and the engine is not a 4-stroke lean burn spark ignition. Therefore there are no applicable emission and operating limitations under this section.

*§ 63.6602 What emission limitations must I meet if I own or operate an existing stationary CI RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?*

The applicable IC engine is not operating at a major source for HAP emissions. Therefore there are no applicable emission and operating limitations under this section.

*§ 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?*

*Compliance with the numerical emission limitations established in this Subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this Subpart.*

*(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this Subpart and the operating limitations in Table 2b to this Subpart which apply to you.*

Table 2b does not apply as it refers only to CI non-emergency engines greater than 500 bhp at area source facilities. Table 2d, however, identifies those limitations required by area sources to comply with the Subpart. The specifics of Table 2d require that the permittee perform regular maintenance on the applicable engine such as changing oil and filters every 500 operating hours, inspect air cleaner every 1,000 hours of operation and inspect all hoses and belts every 500 hours of operation. Each of the maintenance procedures shall occur at the indicated interval or annually, whichever occurs first.

*§ 63.6604 What fuel requirements must I meet if I own or operate an existing stationary CI RICE?*

*(b) Beginning January 1, 2015, if you own or operate an existing emergency CI stationary RICE with a site rating of more than 100 brake HP and a displacement of less than 30 liters per cylinder that uses diesel fuel and operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in §63.6640(f)(4)(ii), you must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted.*

WMI operates an emergency engine with a BHP of 347 and displacement of 8.1 liters per cylinder but does not operate or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in §63.6640(f)(4)(ii).

Permit Condition 7.6 accounts for these requirements.

*§ 63.6605 What are my general requirements for complying with this Subpart?*

*(a) You must be in compliance with the emission limitations and operating limitations in this Subpart that apply to you at all times.*

*(b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved.*



*Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.*

When operating the applicable IC engine, they be operated in a manner that is consistent with reducing emissions and compliance with appropriate limitations applies at all times.

*§ 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?*

The engine located at WMI is not required to perform any performance tests and the applicable IC engine is not operating at a major source for HAP emissions. No testing is required in accordance with Table 2d of the subpart.

*§ 63.6611 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?*

The engine located at WMI is not required to perform any performance tests and the applicable IC engine is not operating at a major source for HAP emissions. No testing is required in accordance with Table 2d of the subpart.

*§ 63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?*

The engine located at WMI is not required to perform any performance tests. No testing is required in accordance with Table 2d of the subpart.

*§ 63.6615 When must I conduct subsequent performance tests?*

The engine located at WMI is not required to perform any performance tests. No testing is required in accordance with Table 2d of the subpart.

*§ 63.6620 What performance tests and other procedures must I use?*

The engine located at WMI is not required to perform any performance tests. No testing is required in accordance with Table 2d of the subpart.

*§ 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?*

*(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:*

*(3) An existing emergency or black start stationary RICE located at an area source of HAP emissions;*

The applicable IC engine needs to be operated in accordance with manufacturer's specifications or a maintenance plan may be developed that is consistent with good air pollution control practices.

*(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.*

A non-resettable meter shall be installed if not previously installed.

*(h) If you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.*

Idle startup time may not exceed 30 minutes. Applicable emissions standards must be met following the allowable 30 minutes.

*(i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.*

This section allows WMI to develop their own oil analysis program to modify the oil changing frequency if the program meets all criteria set forth in subsection i of the subpart.

*§ 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?*

The applicable IC engine is designated as emergency, and it does not have any emission or operating limitations. Rather, maintenance requirements are specified in Table 2d of this subpart. Therefore, this section is not applicable.

*§ 63.6635 How do I monitor and collect data to demonstrate continuous compliance?*

The applicable IC engine is designated as emergency, and it does not have any emission or operating limitations. Rather, maintenance requirements are specified in Table 2d of this subpart. As a result data capture is not necessary. Therefore, this section is not applicable.

*§ 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?*

*(a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.*

Section 9 of Table 6 of the subpart pertains to the emergency IC engine at WMI. Requirement work practices are accounted for within Permit Condition 7.5 of the associated permit.

*(f) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.*

*(1) There is no time limit on the use of emergency stationary RICE in emergency situations.*

*(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).*

*(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.*

*(ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.*

*(iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.*

*(3) Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.*

*(4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.*

*(i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.*

*(ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:*

*(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.*

*(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.*

*(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.*

*(D) The power is provided only to the facility itself or to support the local transmission and distribution system.*

*(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.*

The above requirements pertain specifically to emergency engines. Permit Condition 7.6 accounts for these requirements.

*§ 63.6645 What notifications must I submit and when?*

*(a) You must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified if you own or operate any of the following:*

*(5) This requirement does not apply if you own or operate an existing stationary RICE less than 100 HP, an existing stationary emergency RICE, or an existing stationary RICE that is not subject to any numerical emission standards.*

This section of the subpart is not applicable to the engine at WMI because it is designated as emergency. 63.6645(a)(5) explicitly exempts emergency engines from this requirement.

*§ 63.6650 What reports must I submit and when?*

*(a) You must submit each report in Table 7 of this subpart that applies to you.*

All required reporting is specified in Table 7 of Subpart ZZZZ. Section 4 of Table 7 outlines reporting requirements for emergency stationary RICE that operate or are contractually obligated to be available for more than 15 hours per year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or that operate for the purposes specified in §63.6640(f)(4)(ii). However, the facilities Emergency Engine does not operate for any of those purposes.

*§ 63.6655 What records must I keep?*

*(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;*

*(2) An existing stationary emergency RICE.*

*(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.*

*(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.*

WMI needs to maintain records demonstrating that the engine is being operated in accordance an appropriate maintenance plan. Records of operational hours from the non-resettable meter must also be kept. How many hours were spent in emergency situations and demand response. This requirement is established in Permit Condition 7.7.

*§ 63.6660 In what form and how long must I keep my records?*

*(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).*

*(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.*

*(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).*

Permit Condition 7.7 also accounts for these requirements.

#### **CAM Applicability (40 CFR 64)**

Individual permit units at facilities that are subject to Title V permitting requirements (Tier I permits) may be subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). 40 CFR Part 64 requires CAM for units that meet all of the following three criteria:

- 1) The unit must have an emission limit for the pollutant;
- 2) The unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers, etc.; and
- 3) The unit must have a pre-control potential to emit of greater than the major source thresholds.

The wood processing and handling has cyclones and baghouses but there are no emission limits existing on the emissions units. Therefore, CAM does not apply to the emissions unit.

The coating and gluing process emits VOC, HAPs, and TAPs. However, there are no add-on control devices existing for the process; therefore, in accordance with 40 CFR 64.2, CAM is not applicable to this emissions unit.

The printing process emits VOC, HAPs, and TAPs. However, there are no add-on control devices existing for the process; therefore, in accordance with 40 CFR 64.2, CAM is not applicable to this emissions unit.

The diesel generator engine does not have an add-on control equipment; therefore, CAM is not applicable to this emissions unit.

#### **Acid Rain Permit (40 CFR 72-75)**

The facility is not an affected facility as defined in 40 CFR 72 through 75; therefore, acid rain permit requirements do not apply

## **8. PUBLIC COMMENT**

As required by IDAPA 58.01.01.364, a public comment period was made available to the public and affected states from March 7, 2018 to April 9, 2018. No comments from the public or affected states were received.

## **9. EPA REVIEW OF PROPOSED PERMIT**

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on April 9, 2018 via e-mail. On April 9, 2018 EPA Region 10 responded to DEQ via e-mail indicating that EPA will not be reviewing the proposed permit action and will not object to its issuance. EPA stated, "The permit is now eligible for issuance".

## **Appendix A - Emissions Inventory**

### 3.0 Emission Inventory

This section summarizes the facility emissions. The primary emissions from the facility are Non-Point source VOC emissions from the prefinishing and treating door, window and decorative trim pieces and particulate emissions from the woodcutting and shaping operations. Particulates are collected from these processes via various process cyclones and baghouses. The shavings collected in the process cyclones and baghouses is sold as animal bedding or as filler for other commercial products.

#### 3.1 Facility Potential to Emit (PTE) Emissions Summary

Source	PM t/yr	PM 10 t/yr	CO t/yr	NOx t/yr	SO2 t/yr	VOC t/yr
Burners & Ovens	0.06	0.06	0.71	0.85	0.01	0.05
Facility Wide VOC						813.6
Cyclones and Baghouses	4.61	3.07				
Total	4.67	3.13	0.71	0.85	0.01	813.6

#### 3.2 VOC Emissions

Building	VOCs PTE
	Tons/year
1	0.98
2	495.85
3	3.68
4	313.10
5	0.00
Total	813.60

Facility wide PTE for VOC's is 813.6 tons/year; This represents the facility operating all processes 8,760 hours per year.

Facility emissions are conservatively calculated using purchase records and assuming 100% of the volatile components are emitted for all materials purchased.

### 3.3 Particulate Emissions

PARTICULATE	Em. Point	PM Em. Factor	PM 10 Em. Factor	EFs Units	Throughput (annual)	Units	Particula Emission total (tons)
Baghouse N10 (10 bags)	P 3	0.001	0.001	lb/BDT	1,000	BDT	0.0005
Baghouse N 15 (15 bags)	P 4	0.001	0.001	lb/BDT	1,000	BDT	0.0005
Cyclone B	P 6	0.9	0.6	lb/BDT	605	BDT	0.27
Cyclone F Closed	P 7	0	0	lb/BDT	1,043	BDT	0.00
Cyclone C	P 8	0.9	0.6	lb/BDT	417	BDT	0.19
Cyclone I	P 10	0.9	0.6	lb/BDT	1,500	BDT	0.68
Baghouse G	P 11	0.001	0.001	lb/BDT	341	BDT	0.0002
Baghouse E	P 12	0.001	0.001	lb/BDT	757	BDT	0.0004
Cyclone H	P 14	0.9	0.6	lb/BDT	1,500	BDT	0.68
Cyclone J	P 17	0.9	0.6	lb/BDT	3,836	BDT	1.73
Cyclone K	P 18	0.9	0.6	lb/BDT	3,836	BDT	1.73
Baghouse L	P 19	0.001	0.001	lb/BDT	5,179	BDT	0.003
Baghouse M	P 20	0.001	0.001	lb/BDT	6,585	BDT	0.003
Cyclone M1 (closed)	P 21	0	0	lb/BDT	7,673	BDT	0.00
Cyclone M2 (closed)	P 22	0	0	lb/BDT	11,764	BDT	0.00
Cyclone M4 (high-closed)	P 23	0	0	lb/BDT	8,407	BDT	0.00
Cyclone M3 (closed)	P 24	0	0	lb/BDT	171	BDT	0.00
Cyclone D	P 37	0.9	0.6	lb/BDT	21	BDT	0.01
Baghouse O	P 38	0.001	0.001	lb/BDT	1,000,000	BDT	0.500
Cyclone (closed loop)	P 39	0	0	lb/BDT	16,000	BDT	0.00
Cyclone (closed loop)	P 40	0	0	lb/BDT	5,140	BDT	0.00



Cyclone (closed loop)	P 41	0	0	lb/BDT	5,140	BDT	0.00
Cyclone P	P 42	0.9	0.6	lb/BDT	90	BDT	0.04
Cyclone Q	P 43	0.9	0.6	lb/BDT	2,500	BDT	1.13

**Total 6.94**

Emission factors for Cyclones are Department approved site specific as developed in the document "*Fruitland Idaho Facility Cyclone And Cyclone Emission Factor Determination*" submitted on April 23, 2004 and approved by the Department on May 19, 2004.

Emission factors for baghouses are consistent with emission factors for the wood products industry as developed by the Oregon Dept Quality.

### 3.4 Facility Natural Gas Emissions

#### BURNER and OVEN EMISSIONS

PM, PM 10, SOX, CO, NOX

Process Name	Em. Point	Bldg No.	Throughput (annual)	EFs Units	PM t/yr	PM 10 t/yr	CO t/yr	NOx t/yr	SOx t/yr	VOC t/yr
2 N.G. ovens (prime B1&2)	P 9	3	5.7537	lb/10 <sup>6</sup> ft <sup>3</sup>	0.0219	0.0219	0.2417	0.2877	0.001726	0.015823
North RF oven (B3)	P 28	2	3.869	lb/10 <sup>6</sup> ft <sup>3</sup>	0.0147	0.0147	0.1625	0.1935	0.001161	0.010641
South RF oven (B4)	P 29	2	1.593	lb/10 <sup>6</sup> ft <sup>3</sup>	0.0061	0.0061	0.0669	0.0797	0.000478	0.004381
Sum B3 & B4			5.4626		0.0208	0.0208	0.2294	0.2731	0.0016	0.0150
Buckley 5 hd printer (B5)	P 36	1	0.341	lb/10 <sup>6</sup> ft <sup>3</sup>	0.00130	0.00130	0.0143	0.0171	0.000102	0.000939
<b>Totals</b>					<b>0.06468</b>	<b>0.06468</b>	<b>0.71485</b>	<b>0.85102</b>	<b>0.00511</b>	<b>0.04681</b>

Pollutant	Emission Factor	EF Units	Reference
PM	7.6	lb/10 <sup>6</sup> cft	AP 42 Table 1.4-2 Condensable plus filterable
PM 10	7.6	lb/10 <sup>6</sup> cft	AP 42 Table 1.4-2 Condensable plus filterable
CO	84	lb/10 <sup>6</sup> cft	AP 42 Table 1.4-1, small and uncontrolled
NO <sub>x</sub>	100	lb/10 <sup>6</sup> cft	AP 42 Table 1.4-1, small and uncontrolled
SO <sub>2</sub>	0.6	lb/10 <sup>6</sup> cft	AP 42 Table 1.4-2
VOC	5.5	lb/10 <sup>6</sup> cft	AP 42 Table 1.4-2

OVENS	Bldg	# of ea. Oven	Use Area	c. ft.	Total 10 <sup>6</sup> cft
B5	1	1	5 HEAD	341,417	0.341
B3	2	2	NORTH	1,934,679	3.869
B4	2	2	SOUTH	796,634	1.593
B1	3	6	PRIME	940,805	5.645
B2	3	4	PRIME	27,213	0.109

## **Appendix B - Facility Comments for Draft Permit**

**The following comments were received from the facility on January 23, 2018:**

**Facility Comment:** Can permit condition "6.5 Waste Stream" be modified or deleted as the facility assumes 100% release of VOC's from used products and makes further analysis unnecessary.

**DEQ Response:** As this same permit condition appears in the facility's underlying Permit to Construct, a contradiction would occur should Tier 1 permit condition 6.5 "Waste Stream" be modified or deleted. If the facility wishes to modify this condition a Permit to Construct modification request must first be made and processed as is standard DEQ policy.